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March 22, 2023

Via ECF

Hon. Jennifer L. Rochon
U.S. District Judge
U.S. District Court, Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

RE: Thorne v. Loyola Marymount University (Case No. 23-CV-00985 (JLR))
Defendant's Consent Motion For Extension of Time to Meet and Confer and File
Joint Status Letter

Dear Judge Rochon:

This law firm represents Defendant Loyola Marymount University ("Defendant" or "the University") in the above-referenced case. Under Your Honor's February 8, 2023, Order (ECF 6), the parties were required to meet and confer regarding settlement by March 15, 2023, and submit a joint status letter to the Court by March 30, 2023. The parties respectfully request that the deadline to meet and confer be extended to April 14, 2023, which is the deadline for Defendant to respond to the Complaint, and that the deadline to submit a joint status letter be extended to April 29, 2023. This is Defendant's first request for an extension of these deadlines and Plaintiff consents to the request. No other scheduled dates would be effected.

By way of background, this law firm has been representing various universities in similar claims filed by Plaintiff's counsel in this and other New York federal courts. Both counsel are experienced in these types of cases, including the claims, defenses, and issues of standing. Counsel for both parties believe it likely that the case will settle prior to the April 14, 2023, deadline for Defendant to respond to the Complaint.

Settlement efforts in this case have already begun. Defendant learned of the Complaint shortly after it was filed, reached out to Plaintiff's counsel, and signed a waiver of service. This firm has conferred with the University on the claims and defenses and provided draft settlement terms for review by in-house counsel. Due to respective family vacations of the University's lead outside counsel and in-house counsel, progress toward settlement temporarily paused. Defendant's lead counsel was out of the country for the previous two weeks and Defendant's in-house counsel is currently away, returning March 27, 2023. In-house counsel will be unable to review the draft settlement terms until he returns.

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Given the likelihood of settlement, the parties believe that a one-hour meet-and-confer prior to the April 14, 2023, deadline to respond to the Complaint would represent an unnecessary expense. Therefore, the parties respectfully request that the deadline to meet and confer be extended to April 14, 2023, and the deadline to submit a joint status letter be extended to April 29, 2023.

Respectfully submitted,

/s/ Sondra Saporta

Sondra Saporta

cc: All counsel (via ECF)

The request is GRANTED. The parties shall meet and confer by **April 14, 2023** and shall submit a joint status letter by **April 29, 2023**.

Dated: March 23, 2023

New York, New York

SO ORDERED.



JENNIFER L. ROCHON

United States District Judge